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## Attorneys for Defendants

MoneyMutual, LLC, Selling Source, LLC, Montel Brian Anthony Williams, Glenn McKay, PartnerWeekly, LLC, John Hashman, Brian Rauch, Samuel W. Humphreys, Douglas Tulley, and Alton F. Irby III

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
(OAKLAND DIVISION)**

SEAN L. GILBERT, KEEYA MALONE,  
KIMBERLY BILBREW, CHARMAINE B.  
AQUINO, on behalf of themselves and all  
persons similarly situated,

**Plaintiffs,**

V.

BANK OF AMERICA, N.A., et al.,

### Defendants.

Case No. 4:13-cv-01171-JSW

**DECLARATION OF DONALD J.  
PUTTERMAN IN SUPPORT OF THE  
MONEYMUTUAL DEFENDANTS' AND  
MONTEL WILLIAMS' OPPOSITION  
TO PLAINTIFFS' MOTION TO  
CERTIFY CLASSES**

Date: January 8, 2016

**Time: 9:00 A.M.**

Dept. 5

**Hon. Judge S. White, District Judge**

1 I, DONALD J. PUTTERMAN, declare:

2       1. I am an active member in good standing of the State Bar of California and a partner at  
3 the law firm of Puttermann Logan LLP, attorneys for MoneyMutual, LLC, Selling Source, LLC, Glenn  
4 McKay, PartnerWeekly, LLC, LLC, Brian Rauch; John Hashman, Samuel W. Humphreys, and Alton  
5 Irby III ("the MoneyMutual Defendants"); and Montel Williams, in the above-captioned action. I  
6 have personal knowledge of the facts stated in this declaration and if necessary could and would  
7 testify competently under oath thereto.

8       2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the  
9 deposition of Keeyya Malone. I attended and took the deposition on November 23, 2015.

10      3. Attached hereto as Exhibit B is a true and correct copy of excerpts from the  
11 deposition of Charmaine Aquino. I attended and took the deposition on November 24, 2015.

12      4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the  
13 deposition of Kimberly Bilbrew. I attended and took the deposition on November 24, 2015.

14      5. Attached hereto as Exhibit D is a true and correct copy of excerpts from the  
15 deposition of Sean L. Gilbert. I attended and took the deposition on December 1, 2015.

16      6. Attached hereto as Exhibit E is a true and correct copy of the document marked as  
17 Deposition Exhibit 1.

18      7. Attached hereto as Exhibit F is a true and correct copy of the document marked as  
19 Deposition Exhibit 2.

20      8. Attached hereto as Exhibit G is a true and correct copy of the document marked as  
21 Deposition Exhibit 3.

22      9. Attached hereto as Exhibit H is a true and correct copy of the document marked as  
23 Deposition Exhibit 4.

24      10. Attached hereto as Exhibit I is a true and correct copy of the document marked as  
25 Deposition Exhibit 5.

26      11. Attached hereto as Exhibit J is a true and correct copy of the document marked as  
27 Deposition Exhibit 6.

1       12. Attached hereto as Exhibit K is a true and correct copy of the document marked as  
2 Deposition Exhibit 8.

3       13. Attached hereto as Exhibit L is a true and correct copy of the document marked as  
4 Deposition Exhibit 10.

5       14. Attached hereto as Exhibit M is a true and correct copy of the document marked as  
6 Deposition Exhibit 14.

7       15. Attached hereto as Exhibit N is a true and correct copy of the document marked as  
8 Deposition Exhibit 16.

9       16. Attached hereto as Exhibit O is a true and correct copy of the document marked as  
10 Deposition Exhibit 17.

11       17. Attached hereto as Exhibit P is a true and correct copy of the document marked as  
12 Deposition Exhibit 18.

13       18. Attached hereto as Exhibit Q is a true and correct copy of the document marked as  
14 Deposition Exhibit 19.

15       19. Attached hereto as Exhibit R is a true and correct copy of the document marked as  
16 Deposition Exhibit 20.

17       20. Attached hereto as Exhibit S is a true and correct copy of the document marked as  
18 Deposition Exhibit 21.

19       21. Attached hereto as Exhibit T is a true and correct copy of the document marked as  
20 Deposition Exhibit 36.

21       22. Attached hereto as Exhibit U is a true and correct copy of the document marked as  
22 Deposition Exhibit 37.

23       23. Attached hereto as Exhibit V is a true and correct copy of the document marked as  
24 Deposition Exhibit 38.

25       24. Attached hereto as Exhibit W is a true and correct copy of the document marked as  
26 Deposition Exhibit 39.

1       25. Attached hereto as Exhibit X is a true and correct copy of the document marked as  
2 Deposition Exhibit 40.

3       26. Attached hereto as Exhibit Y is a true and correct copy of the document marked as  
4 Deposition Exhibit 41.

5       27. Attached hereto as Exhibit Z is a true and correct copy of the document marked as  
6 Deposition Exhibit 43.

7       28. Attached hereto as Exhibit AA is a true and correct copy of the document marked as  
8 Deposition Exhibit 50.

9       29. Attached hereto as Exhibit BB is a true and correct copy of the document marked as  
10 Deposition Exhibit 51.

11      30. Attached hereto as Exhibit CC is a true and correct copy of the document marked as  
12 Deposition Exhibit 52.

13      31. Attached hereto as Exhibit DD is a true and correct copy of the document marked as  
14 Deposition Exhibit 53.

15      32. Attached hereto as Exhibit EE is a true and correct copy of the document marked as  
16 Deposition Exhibit 54.

17      33. Attached hereto as Exhibit FF is a true and correct copy of the document marked as  
18 Deposition Exhibit 55.

19      34. Attached hereto as Exhibit GG is a true and correct copy of the document marked as  
20 Deposition Exhibit 57.

21      35. Attached hereto as Exhibit HH is a true and correct copy of the document marked as  
22 Deposition Exhibit 58.

23      36. Attached hereto as Exhibit II is a true and correct copy of the document marked as  
24 Deposition Exhibit 59.

25      37. Attached hereto as Exhibit JJ is a true and correct copy of the document marked as  
26 Deposition Exhibit 61.

38. Attached hereto as Exhibit KK is a true and correct copy of the document marked as Deposition Exhibit 65.

39. Attached hereto as **Exhibit LL** is a true and correct copy of the document marked as Deposition Exhibit 66.

40. Attached hereto as Exhibit MM is a true and correct copy of the document marked as Deposition Exhibit 67.

41. Attached hereto as Exhibit NN is a true and correct copy of the document marked as Deposition Exhibit 70.

42. Attached hereto as Exhibit OO is a true and correct copy of the document marked as Deposition Exhibit 71.

I declare under penalty of perjury under the laws of the State of California that the foregoing  
is true and correct. Executed on December 18, 2015

/s/ DONALD J. PUTTERMAN

Donald J. Puttermann